

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES
AND PRODUCTS LIABILITY
LITIGATION

This relates to:

*Baxter (3:19-cv-12776); Hill (3:18-cv-15598); Hykes (3:19-cv-12734);
Justice (3:18-cv-00333); Recio (3:19-cv-12775); Wasial (3:19-cv-17838)*

MDL No. 3:16-md-02738

**NOTICE OF MOTION TO
DISMISS PLAINTIFFS'
COMPLAINTS PURSUANT TO
RULE 41(b)**

TO: *All Counsel of Record*

COUNSEL:

PLEASE TAKE NOTICE that Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. ("Defendants"), will move before this Court on November 2, 2020, or as soon thereafter as counsel may be heard, pursuant to Fed. R. Civ. P. 41(b), for an Order dismissing plaintiffs' complaints for failure to comply with this Court's May 15, May 26, June 4, September 17, and September 19, 2020 Orders.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion to Dismiss, Defendants will rely upon the accompanying Letter Brief in Support.

PLEASE TAKE FURTHER NOTICE that a Proposed Order is attached.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko

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Inc.*

Dated: September 29, 2020